

Charles H. McCrea, Esq. (SBN #104)  
PRHLAW<sub>LLC</sub>  
520 South Fourth Street, Suite 360  
Las Vegas, NV 89101  
T: 702.834.6166  
charles@prhlawllc.com

Thomas F.A. Hetherington, Esq.\*  
Jennifer H. Chung, Esq.\*  
MCDOWELL HETHERINGTON LLP  
1001 Fannin St., Suite 2400  
Houston, Texas 77002  
T: (713) 337-5580 | F: (713) 337-8850  
tom.hetherington@mhllp.com  
jennifer.chung@mhllp.com  
\*To be admitted *pro hac vice*

Attorneys for BLUE CROSS OF  
CALIFORNIA D/B/A ANTHEM BLUE  
CROSS AND ANTHEM BLUE CROSS  
LIFE AND HEALTH INSURANCE  
COMPANY

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

SUNRISE HOSPITAL AND MEDICAL  
CENTER, LLC; SUNRISE  
MOUNTAINVIEW HOSPITAL, INC.; and  
SOUTHERN HILLS MEDICAL CENTER,  
LLC,

Plaintiffs,

v.

BLUE CROSS OF CALIFORNIA D/B/A  
ANTHEM BLUE CROSS; ANTHEM BLUE  
CROSS LIFE AND HEALTH INSURANCE  
COMPANY; and KEENAN &  
ASSOCIATES, INC.,

Defendants.

Case No. 2:23-cv-01986-APG-EJY  
Hon.

**STIPULATION AND ORDER TO  
EXTEND DEFENDANTS' TIME TO  
FILE REPLY IN SUPPORT OF THEIR  
MOTION TO DISMISS PLAINTIFF'S  
FIRST AMENDED COMPLAINT [ECF  
NOS. 37 (MOTION); 49 (PLAINTIFFS'  
RESPONSE)]**

**(THIRD REQUEST)**

1 Defendants Blue Cross of California dba Anthem Blue Cross and Anthem Blue Cross Life  
2 and Health Insurance Company (collectively, the “Anthem Defendants”) and Plaintiffs Sunrise  
3 Hospital and Medical Center, LLC; Sunrise Mountainview Hospital, Inc.; and Southern Hills  
4 Medical Center, LLC (“Plaintiffs”) by and through their respective undersigned counsel, hereby  
5 stipulate and agree as follows:

6 Plaintiffs’ First Amended Complaint adding the Anthem Defendants to this lawsuit was  
7 filed on January 4, 2024. [ECF No. 14]. The Anthem Defendants filed a Motion to Dismiss on  
8 February 29, 2024 after receiving one extension. [ECF No. 37.]

9 Plaintiffs’ Response to the Anthem Defendants’ Motion to Dismiss was filed on April 11,  
10 2024. [ECF No. 49]

11 The Anthem Defendants filed a Stipulation and Order to Extend Defendants’ Time to File  
12 Reply in Support of Their Motion to Dismiss on April 15, 2024 and it remains pending. [ECF No.  
13 50]

14 The Anthem Defendants require additional time in order to file their reply in support of  
15 their Motion to Dismiss to evaluate Plaintiffs’ arguments and due to schedules and other deadlines.

16 The Parties therefore stipulate and agree to extend the deadline for the Anthem Defendants  
17 to file their reply until and through May 9, 2024.

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1 This is the Anthem Defendants' third request for an extension. This stipulation is made in  
2 good faith and not to delay the proceedings.

3 DATED this 1<sup>st</sup> day of May 2024.

4 BAILEY KENNEDY

PRHLAW<sub>LLC</sub>

5 By/s/Joshua M. Dickey

By/s/Charles H. McCrea

6 Joshua M. Dickey

Charles H. McCrea, Esq. (SBN #104)

7 Paul C. Williams

520 South Fourth Street, Suite 360

8 Rebecca L. Crooker

Las Vegas, Nevada 89101

8984 Spanish Ridge Avenue

Las Vegas, Nevada 89148-1302

MCDOWELL HETHERINGTON LLP

Thomas F.A. Hetherington, Esq.\*

9 *Attorneys for Plaintiffs*

Jennifer H. Chung, Esq.\*

1001 Fannin Street, Suite 2400

Houston, Texas 77002

\*To be admitted *pro hac vice*

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12  
13 *Attorneys for Defendants Blue Cross of*  
14 *California dba Anthem Blue Cross and*  
15 *Anthem Blue Cross Life and Health Insurance*  
16 *Company*

17 **IT IS SO ORDERED:**

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19  
20 UNITED STATES DISTRICT JUDGE

21 DATED: May 2, 2024